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19 October 2023

VIA ECF

Hon. Stephanie A. Gallagher, Judge
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21202

RE: *United States v. Brownlee, et al.*
Case No. SAG-22-125

Dear Judge Gallagher:

I represent Tasha Woodyard in the above-captioned case. I write to supplement the Government's status letter of today's date and to clarify my position.

Assistant United States Attorney Everett reports accurately that on behalf of Ms. Woodyard, I have respectfully requested a trial schedule be set. In her letter, ECF 306, she also reflects correctly that a third superseding indictment was filed recently and defense counsel will need time to review all of the discovery, old and new. Nevertheless, I expect that the Court's calendar is quite full and that if a trial were to be set, it would not be able to be held until Spring or Summer of 2024. I would anticipate that a trial six to nine months out, if that soon, would give defense counsel time to review the discovery and make competent decisions on this case and comports with the Government's suggestion that "[a]dditional time seems warranted" to allow such review. My concern is that if the Court grants another delay in setting a trial date, that date will be even farther in the future.

AUSA Everett's letter also indicates that I do not consent to a further speedy trial exclusion. That statement is correct in part; as indicated herein, I would object to another period of delay before setting a trial date; I would certainly be required to accept any speedy trial exclusion up until the start of the trial.

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Although trials in federal court are rarely “speedy” due to Court congestion and case complexity, the concept of establishing a known trial date remains a valid defense interest. Therefore, on behalf of Ms. Woodyard, I respectfully request that the Court schedule a conference call for the purpose of setting a trial date agreeable to the Court, Government counsel and all defense counsel.

Thank you for your consideration of this matter.

Very truly yours,
/s/
Richard Bardos, Of Counsel

RBB:rb